

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Access Charge Reform	)	CC Docket No. <u>96-262</u>
	)	
Price Cap Performance Review for Local Exchange Carriers	)	CC Docket No. 94-1
	)	
MCI Telecommunications Corporation Emergency Petition for Prescription of Access Charges	)	CC Docket No. 97-250
	)	
Consumer Federation of America Petition for Rulemaking	)	RM 9210

**DENIED**  
 BY *John E Jackson*  
 DATE *10/20/98*

**UNITED STATES TELEPHONE ASSOCIATION  
MOTION FOR EXTENSION OF TIME**

The United States Telephone Association (USTA) respectfully requests an extension of time to file comments and replies in the above-referenced proceedings. USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the incumbent LEC-provided access lines in the U.S. Its members include the incumbent LECs subject to price cap regulation.

In a Public Notice released October 5, 1998, the Commission asked parties to update and refresh the record on access charge reform, the price cap X factor, prescription of access rates and access pricing flexibility for price cap companies. USTA requests that the Commission extend the comment date to November 20, 1998 and the reply comments to December 20, 1998.

The record already before the Commission in these dockets is voluminous and substantial time is required to collect the information necessary to provide the Commission with the

information it has requested. For example, USTA will update the productivity models on the record in CC Docket No. 94-1. The Commission staff is well aware of the time required to collect and verify the data, run the models and verify the results. The Commission's comment cycle does not provide sufficient time to accomplish those tasks. Of course, that effort represents only one part of the overall effort to update and refresh the record in all of the proceedings listed.

USTA's request for additional time will assist it and other parties in providing the Commission with relevant information. The proceedings are approximately a year old and significant changes have occurred in our industry in that time. Additional time on the reply cycle is extremely important to permit parties to respond to the updated information presented. USTA's request will not inconvenience any party or delay any Commission decision.

Therefore, USTA requests that the Commission grant a three week extension to November 20, 1998 to file comments and provide for four weeks until December 20, 1998 to file replies. In the alternative, USTA would support the October 9, 1998 request of the Association for Local Telecommunications Services to extend the comments for two weeks, but would strongly recommend that the Commission allow four weeks before replies are due.

Respectfully submitted,

**UNITED STATES TELEPHONE ASSOCIATION**

By:  \_\_\_\_\_

Its Attorneys

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